

FEB 15 1994

Mr. Albert R. Chernoff, Project Manager
Uranium Mill Tailings Remedial Action
Project Office
U. S. Department of Energy
Albuquerque Operations Office
P. O. Box 5400
Albuquerque, New Mexico 87185-5400

Dear Mr. Chernoff:

The U.S. Nuclear Regulatory Commission staff has completed its review of the final Long-Term Surveillance Plan (LTSP) for the Tuba City, Arizona, Uranium Mill Tailings Remedial Action (UMTRA) Project site. As a result of this review, the staff determined that additional information is needed with regard to groundwater monitoring. A request for the specific information is enclosed. In addition, the transmittal letter of January 15, 1993, from Russel Edge, indicated that the LTSP did not include documentation of the final Custodial Care Agreement with the Navajo Nation and Hopi Tribe, and letters from local agencies responding to the emergency notification requests sent out by the UMTRA Project Office. Therefore, NRC staff cannot accept the final LTSP until a revised document is provided containing the requested information.

If you have any questions, please contact the NRC Project Manager, Sandra L. Wastler at (301) 504-2582.

Sincerely,

Joseph J. Holonich, Acting Chief
Uranium Recovery Branch
Division of Low-Level Waste Mangement
and Decommissioning
Office of Nuclear Material Safety
and Safeguards

Enclosure: As stated
cc: R. Edge, DOE Alb

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Tuba City, Arizona Site
LTSP Comments

Chapter 5.0 GROUNDWATER MONITORING

This chapter provides a clear and detailed description of DOE's proposed post-closure ground-water monitoring program for the site. One important element of the monitoring program is lacking. There is no discussion of Point of Compliance (POC) wells or monitoring to demonstrate that the constructed disposal cell is performing according to design. The wells and database developed for the site appear to be geared toward ground-water clean-up, since they are within and immediately around the contaminant plume. These data provide a good characterization of the existing conditions; however, the locations of the monitoring wells may not be suitable for monitoring disposal cell performance. The wells do appear to be well suited for evaluating and monitoring the existing contaminant plume which resulted from previous milling operations. Additionally, the last paragraph of subsection 5.2.1 (page 5-20) indicates that three wells will be installed along the downgradient edge of the disposal cell as shown in Figure 5.2. The figure shows the location of these wells as being near the center of the contaminant plume or outside the downgradient extent of the plume.

DOE should revise Chapter 5.0 to emphasize how the ground-water monitoring program will address the long-term surveillance and performance of the disposal cell. DOE should also install POC wells along the downgradient edge(s) of the disposal cell for the purpose of conducting the long-term surveillance monitoring.